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1 at this juncture.
 2 Q Thank you.
 3 And in the e-mail message that was forwarded,
 4 Mr. Cotner was sharing what he described as important
 5 plot points of potential cliffhangers for the Making a
 6 Murderer episodes; correct?
 7 A It appears to be that, correct.
 8 Q Directing your attention to the next several
 9 pages in Exhibit 7, which are Bates-stamped NFXCOL 235
 10 through 240. If you could just take a moment and look at
 11 those.
 12 A Do you want me to read them?
 13 Q I realize you are not listed on this e-mail
 14 message. But just trying to make sense of this format.
 15 Do these appear to be possibly notifications from Google
 16 Docs regarding comments being added to a document
 17 relating to Making a Murderer?
 18 A Let me just take a moment to take a look at it.
 19 Q Okay.
 20 A This isn't a usual format for me. I don't think
 21 I've ever seen it. So give me a moment, please.
 22 Q Certainly. Thank you.
 23 A This is a very confusing document, so I would be
 24 speculating about what I think it is. If you want me to
 25 speculate, I can.

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1 Q I was hoping it might be evident to you, so
 2 that's fine. We'll just move forward to the pages marked
 3 NFXCOL 1975 through -- well, why don't I just start with
 4 that. Directing your attention to the document marked
 5 NFXCOL 1975, which should be the next document in the
 6 Exhibit 7.
 7 A I have that.
 8 Q If you could take just a moment and -- and
 9 review it, please.
 10 A Okay. I'll read it now.
 11 Q Thank you.
 12 A Okay. I've read it.
 13 Q This -- or the document Bates-stamped
 14 NFXCOL 1975 is an e-mail message from you to Ms. Demos,
 15 Laura Ricciardi, Mary Manhardt, and Lisa Dennis, dated
 16 July 11th, 2015; correct?
 17 A Correct.
 18 Q This -- in the text of the message, it indicates
 19 that you are forwarding to the recipients the series
 20 notes for Making a Murderer as of that date; correct?
 21 A Correct.
 22 Q Okay. So, then, directing your attention to the
 23 next several pages, NFX -- marked NFXCOL 1976 through
 24 NFXCOL 2012. If you could please take a moment and at
 25 least page through those.

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1 A Sorry. Did you say you're skipping to 2012?
 2 Q Yes.
 3 A Okay.
 4 Q No. I'm sorry. I'm asking you to look at 1976
 5 through 2012.
 6 A Oh, okay. Sorry.
 7 Q I don't think you need to read every line. I'm
 8 not asking line-by-line questions.
 9 A Okay. I've skimmed it.
 10 Q Does the document identified as NFXCOL 1976
 11 through 2012 appear, to your recollection, to be the
 12 attachment to your July 11, 2015 e-mail?
 13 A It appears to be.
 14 Q And did you create the attachment to the e-mail
 15 message?
 16 A I did not. I'm sure I contributed. As I have
 17 mentioned before, we work very collaboratively on the
 18 creation of the notes. But this specific type of format
 19 was not my format.
 20 Q Appears as though it was prepared using a
 21 PowerPoint or similar program; is that correct?
 22 A It's -- I say that specifically because of style
 23 on some of the episode overall pages where you'll see
 24 kind of a split of the left and the right end lines is a
 25 style choice. Effective, but just not one that I

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1 personally use. So -- but as far as creative notes and
 2 discussion, it is -- again, I can't recall the specific
 3 experience of crafting these notes, as it's been some
 4 time. But reasonable to think that I was part of those
 5 discussions alongside Ben and Adam in the creation of
 6 these notes.
 7 Q Thank you.
 8 Directing your attention to the next page of
 9 Exhibit 7, which is Bates-stamped NFXCOL 241.
 10 Have you had a chance to review it?
 11 A I'm just finishing.
 12 Q I'm sorry.
 13 A Okay. Read it.
 14 Q That document is a copy of an e-mail message
 15 from you to Mr. Cotner and Mr. Del Deo, dated July 16,
 16 2015; correct?
 17 A Yes.
 18 Q And it indicates that you are -- strike that.
 19 It indicates that you took a stab at music notes
 20 for Making a Murderer; correct?
 21 A Correct.
 22 Q And it -- on the attachment line, it indicates
 23 that there's a Making a Murderer music notes Episode 1
 24 file; correct?
 25 A That's right.



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<p style="text-align: right;">Page 134</p> <p>1 Q And directing your attention to NFXCOL 242 and 2 243, which should be the next two pages. If you could 3 take a moment and look through those, please. 4 A Okay. 5 Okay. I've read it. 6 Q Are you able to identify the documents 7 Bates-stamped NFXCOL 242 and 243 as the attachment to the 8 preceding e-mail message Bates-stamped NFXCOL 241? 9 A There's nothing on the actual document 10 indicating that it's such. But I think it's reasonable 11 to believe that it is. 12 Q The documents, yeah, stated are attached -- or 13 strike that -- the documents Bates -- identified as 14 NFXCOL 242 and 243 appear to contain notes relating to 15 music for the -- a Making a Murderer episode in this 16 case; correct? 17 A A episode, correct. I can't necessarily confirm 18 or deny whether that's Episode 1. And, yes, it appears 19 to be focused on music. 20 Q You drafted the music notes that are represented 21 in NFXCOL 242 and 243; correct? 22 A Well, per the e-mail, because I don't recall 23 actually doing this. But per the e-mail. As I mentioned 24 before, we're collaborative in the way we work. So one 25 of us will take the lead and take the first draft of the</p>	<p style="text-align: right;">Page 136</p> <p>1 A I think that's fair to assume. 2 Q Directing your attention to the next document in 3 Exhibit 7, which is Bates-stamped NFXCOL 2013. 4 A I have it. 5 Q That is a copy of an e-mail message from you to 6 Ms. Demos, Ms. Ricciardi, Ms. Manhardt, and Ms. Dennis, 7 dated July 16, 2015; is that correct? 8 A Correct. 9 Q Okay. And that message indicates that you, 10 Adam, and Ben are, through that message, forwarding your 11 updated series notes. 12 A I'm gonna read it really quickly. 13 Q Yes. Please do. I'm sorry. 14 A I've read it. 15 Q The message represented at NFXCOL 2013 indicated 16 that you were forwarding to the recipients the updated 17 series notes from the Netflix creative team; is that 18 correct? 19 A Yes. 20 Q And following our prior pattern, I would direct 21 your attention to NFXCOL 2014 through 2045 and ask you to 22 look through to see whether it appears to be the series 23 notes attachment that is referenced in the preceding 24 e-mail message. 25 I would note that, helpfully, there seems to be</p>
<p style="text-align: right;">Page 135</p> <p>1 note document which is then opened to the other two. 2 So, I believe that this represents the, again, 3 very rough preliminary notes that then were made 4 available to Ben and Adam and myself to continue to 5 refine and to discuss. 6 Q Would music notes be a particular forte of 7 yours, given your background in the music industry? 8 A I mean, it's one of the many tools that one uses 9 in storytelling that I think is important. But I 10 wouldn't say I had more of an expertise than Ben or Adam 11 who are both directors as well as studio executives. 12 Q Directing your attention, then, Ms. Nishimura, 13 to the next two pages in Exhibit 7, which are 14 Bates-stamped NFXCOL 244 and 245. 15 Please take a look at those when you have them. 16 A Oh, it's this mail. 17 Okay. I've read them. 18 Q The document at NFXCOL 244 and 245 is a copy of 19 a message from Adam Del Deo to you, dated July 16, 2015, 20 and forwarding a message from Mr. Del Deo to Mr. Cotner; 21 is that correct? 22 A Yes. 23 Q And, presumably, Mr. Del Deo was forwarding that 24 to you so that you would have an opportunity to see the 25 content of the forwarded message; correct?</p>	<p style="text-align: right;">Page 137</p> <p>1 a date on the second page. 2 A Yes, very helpful. It does appear to be the 3 corresponding series notes document. 4 Q And, again, sounds as though -- I think I see 5 some errors -- arrows or lines. So this, likely, isn't a 6 document that you specifically initiated or created, but 7 rather -- or strike that. 8 This isn't a document that you, likely, created 9 in the computer system; correct? 10 A Yes. That's correct. 11 Q Okay. But it's rather a document that was 12 created, likely, by another team member and then 13 circulated and reviewed by the rest of the team; correct? 14 A That's correct. 15 MS. BARKER: We can set that exhibit aside. 16 Mr. Videographer, I would ask that you please 17 hand to the witness the document marked as Exhibit 8. 18 (Exhibit 8 was marked for identification, a copy 19 of which is attached hereto.) 20 BY MS. BARKER: 21 Q Directing your attention, Ms. Nishimura, to the 22 pages in Exhibit 8 that are Bates-stamped NFXCOL 2137 23 through 2176. 24 And, again, I'm not asking you to read every 25 line but, rather, to review the document and indicate</p>

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